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*Co-Lead Counsel for the Classes and  
Attorneys for Individual and Representative Plaintiffs  
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez,  
Brandon Vera, and Kyle Kingsbury*

[Additional counsel appear on signature page]

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle  
Kingsbury on behalf of themselves and all  
others similarly situated,

Plaintiffs,

vs.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**DECLARATION OF KEVIN E. RAYHILL  
IN SUPPORT OF PLAINTIFFS'  
MOTION TO CHALLENGE  
ATTORNEY-CLIENT PRIVILEGE**

1 I, Kevin E. Rayhill, declare and state as follows:

2 1. I am an attorney at the Joseph Saveri Law Firm, Inc. ("JSLF"), Co-Lead Counsel for  
3 the Classes and Attorneys for Individual and Representative Plaintiffs Cung Le, Nathan Quarry, Jon  
4 Fitch, Luis Javier Vazquez, Brandon Vera, and Kyle Kingsbury in the above-captioned matter. I am a  
5 member in good standing of the State Bar of California, and have been admitted to this Court *pro hac*  
6 *vice*. I am over 18 years of age and have personal knowledge of the facts stated in this Declaration. If  
7 called as a witness, I could and would testify competently to them.

8 2. I make this declaration in support of Plaintiffs' Motion to Challenge Attorney-Client  
9 Privilege with respect to twelve certain documents. Defendant produced the documents in the  
10 course of discovery. On November 30, 2016, and December 5, 2016, Defendant sent Plaintiffs  
11 letters claiming the documents were privileged attorney-client communications and purporting to  
12 claw the documents back.

13 3. Attached hereto as Exhibit 1 is a publicly filed placeholder for the document with the  
14 Bates stamp ZFL-0550804. This document will be lodged with the Court under seal.

15 4. Attached hereto as Exhibit 2 is a publicly filed placeholder for the document with the  
16 Bates stamp ZFL-1014045. This document will be lodged with the Court under seal.

17 5. Attached hereto as Exhibit 3 is a publicly filed placeholder for the document with the  
18 Bates stamp ZFL-1014047. This document will be lodged with the Court under seal.

19 6. Attached hereto as Exhibit 4 is a publicly filed placeholder for the document with the  
20 Bates stamp ZFL-1014049. This document will be lodged with the Court under seal.

21 7. Attached hereto as Exhibit 5 is a publicly filed placeholder for the document with the  
22 Bates stamp ZFL-1014072. This document will be lodged with the Court under seal.

23 8. Attached hereto as Exhibit 6 is a publicly filed placeholder for the document with the  
24 Bates stamp ZFL-1014078. This document will be lodged with the Court under seal.

25 9. Attached hereto as Exhibit 7 is a publicly filed placeholder for the document with the  
26 Bates stamp ZFL-1014102. This document will be lodged with the Court under seal.

27 10. Attached hereto as Exhibit 8 is a publicly filed placeholder for the document with the  
28 Bates stamp ZFL-1014103. This document will be lodged with the Court under seal.

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of December, 2016 a true and correct copy of  
**DECLARATION OF KEVIN E. RAYHILL IN SUPPORT OF PLAINTIFFS' MOTION TO  
CHALLENGE ATTORNEY-CLIENT PRIVILEGE** was served via the United States District  
Court CM/ECF system on all parties or persons requiring notice.

By: /s/ Kevin E. Rayhill